

M I C H A E L H U E S T O N
A T T O R N E Y A T L A W

1 6 C O U R T S T R E E T
3 5 T H F L O O R
B R O O K L Y N , N E W Y O R K 1 1 2 4 1

T e l : (7 1 8) 2 4 6 - 2 9 0 0
F a x : (7 1 8) 2 4 6 - 2 9 0 3
E m a i l : m h @ m i c h a e l h u e s t o n . c o m

A D M I T T E D N Y

September 19, 2024

BY EMAIL

S.P.O. Frank Thomas Nikolaidis
United States Probation Department
Eastern District of New York
147 Pierrepont Street
Brooklyn, New York 11201

Re: *United States v. Ruslan Mirvis*, 17 Cr. 273 (S-1) (FB)

Dear Officer Nikolaidis:

I represent Ruslan Mirvis in this matter. This letter sets forth Mr. Mirvis's objections, comments, and corrections to the Presentence Report, dated December 26, 2023. This letter corrects typographical errors in my letter from September 10, 2024.

A. Identifying Data

Mr. Mirvis was born the Union of Soviet Socialist Republic, not the Ukraine. *See* Pre-Sentence Report at ¶ 77.

B. Personal and Family Data

¶ 77: Mr. Mirvis's mother's name is Marina Yudkiss.

¶ 81: Mr. Mirvis's mother lost a child before his brother Richard was born. Mr. Mirvis's grandparents are deceased and he witnessed their passing.

¶ 86: We provide the attached additional program certificates that Mr. Mirvis has amassed while incarcerated.

While at the Metropolitan Detention Center ("MDC"), Mr. Mirvis saw psychologist Dr. Huber. He has participated in self-help courses. Mr. Mirvis was also an aide for D. Harper Recreational Specialist at the MDC. He cleaned the recreational yard. He also ran chess and art clubs at the MDC. He also volunteered for suicide watch, taking his initial training in June 2019 under Dr. G. DeZayas. While on watch, he observed inmates and would report on their condition. He would also talk to them and try to calm them. The shifts were six hours and he would often work two shifts in a day.

Mr. Mirvis has taken approximately 1,000 hours in legal assistance and paralegal courses, business and criminal law, business courses, self-management, leadership, wellness, disaster

preparation, anger management, offender responsibility, substance abuse, a 12-step program, and offender corrections. He has also worked on the work detail at Essex County Correctional Facility. His supervisor stated he was trustworthy. He was made a tier representative. His responsibilities included providing computer tablets to inmates, monitoring for violations of tablet policies, helping inmates fill out documents, and monitoring computers for violations. In the course of this work, an inmate assaulted Mr. Mirvis, sending him to the hospital.

Mr. Mirvis was not actually “sanctioned to sixty days’ loss of email privileges” for the stated “July 8, 2019” prison violation for accepting money without authorization.

C. Educational, Vocational and Special Skills

¶ 105: Mr. Mirvis also attended Hebrew School.

¶ 107: In grade school, Mr. Mirvis was in many school plays. In junior high school Mr. Mirvis was a member of the Chess Club, Television Studio Programming, and Movie Making and Broadcasting programs.

¶ 111: Mr. Mirvis also worked at Stages Deli, Angelo’s and Max’s Steakhouse, Kosher Delight, and Kosher Catering.

Sincerely,

/s/Michael Hueston

cc: Assistant United States Attorneys